

ENCLOSURE

NOTICE OF VIOLATION

Georgia Power Company
Hatch

Docket Nos. 50-321 and 50-366
License Nos. DPR-57, NPF-5

During the Nuclear Regulatory Commission (NRC) inspection conducted on November 30 - December 11, 1987, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (1988), the violations are listed below:

- A. 10 CFR 50.59(b)(1) states that the licensee shall maintain records of changes in the facility and that these records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety determination.

Contrary to the above, the safety evaluation for Design Change Request DCR 85-007, Revision 1 did not adequately detail the bases for determining that the addition of a 45-second delay timer relay to the Reactor Water Cleanup System (RWCU) valves 2G31-F001 and 2G31-F004 was not an unreviewed safety question. The determination did not consider the original design basis for the actuation or various failure modes, nor did it document any design basis accidents that were reviewed for impact, or other systems and components that could have been affected by the change. Additionally, this change made these valves exceed the Technical Specification (TS) Table 3.3.2-3, required response time of 13 seconds.

This is a Severity Level IV violation (Supplement I).

- B. 10 CFR 50, Appendix B, Criterion XI; and the licensee's accepted Quality Assurance program, Final Safety Analysis Report (FSAR) Section 17.2.11, collectively require that appropriate tests be performed and documented to assure satisfactory performance of structures, systems and components. The FSAR, Appendix A, commits to Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations), which endorses American National Standards Institute (ANSI) N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants. Section 5.2.7 of this Standard requires that a suitable level of confidence in structures, systems, or components on which maintenance or modifications have been performed shall be attained by performance testing.

Contrary to the above, after maintenance was performed on RWCU System inboard isolation valve 1G31-F001 on December 25, 1984, adequate testing was not performed to ensure the valve would isolate on a high differential flow isolation actuation signal as required by TS in that, on January 5 and 10, 1985, the valve failed to close upon receiving this signal. In addition, post-modification testing was not performed after installing a 45-second time delay relay in the RWCU system after performing Maintenance Work Order 1-85-401.

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Pursuant to the provisions of 10 CFR 2.201, Georgia Power Company is hereby required to submit a written statement or explanation to the Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555, with a copy to the Regional Administrator, Region II, and a copy to the NRC Resident Inspector, Hatch, within 30 days of the date of the letter transmitting this Notice. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include [for each violation]: (1) admission or denial of the violation, (2) the reason for the violation if admitted, (3) the corrective steps which have been taken and the results achieved, (4) the corrective steps which will be taken to avoid further violations, and (5) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked or why such other action as may be proper should not be taken.

FOR THE NUCLEAR REGULATORY COMMISSION

Caudle A. Julian

Caudle A. Julian, Chief
Operations Branch
Division of Reactor Safety

Dated at Atlanta, Georgia
this 31th day of May 1988